

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

CHARLOTTE CHARLES, *et al.*,

Plaintiffs,

v.

ANNE SACOOLAS, *et al.*,

Defendants.

Civil Case No. 1:20-cv-1052

**PLAINTIFFS' MOTION TO CONTINUE HEARING ON MOTION TO ENFORCE  
CHARGING LIEN**

The plaintiffs respectfully move the Court for a continuance of the hearing on Cohen Milstein Sellers & Toll PLLC's ("CMST") motion to enforce a charging lien. The hearing is set for December 21, 2021, but undersigned counsel has a long-planned family vacation from December 18-22. CMST and Levy Firestone Muse LLP have authorized undersigned counsel to represent to the Court that they do not object to a continuance. Counsel have conferred on available dates and respectfully request that in setting a date the Court avoid the following dates:

- January 3-5, 7, 10-12, 25

By: s/ Jay Nanavati  
Jay R. Nanavati  
*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 10, 2021, I electronically filed the foregoing with the Clerk of the Court using the ECF.

Dated: December 10, 2021

s/ Jay Nanavati  
Jay R. Nanavati